

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

MATHEW MARTOMA,

Defendant.

No. 12-cr-00973 (PGG)  
ECF Case

**DECLARATION OF RICHARD M. STRASSBERG IN  
SUPPORT OF DEFENDANT MATHEW MARTOMA'S  
MOTION TO EXCLUDE EVIDENCE OF HIS FAINTING  
WHEN APPROACHED BY GOVERNMENT AGENTS**

**(MR. MARTOMA'S MOTION *IN LIMINE* NO. 5)**

I, Richard M. Strassberg, declare under penalty of perjury as follows:

1. I am a member of the law firm of Goodwin Procter LLP, attorneys for Defendant Mathew Martoma in this action. I have personal knowledge of and am fully familiar with the facts and circumstances set forth herein by virtue of both my representation of Mr. Martoma and my review of the case file in this action. I submit this declaration in support of Mr. Martoma's Motion to Exclude Evidence of his Fainting When Approached by Government Agents in *United States v. Martoma*, 12 Cr. 973 (PGG).

2. Attached hereto as Exhibit A is a true and correct copy of Bryan Burrough & Bethany McLean, *The Hunt for Steve Cohen*, VANITY FAIR, June 2013.

3. Attached hereto as Exhibit B is a true and correct copy of Sheelah Kolhatkar, *Why Hasn't Ex-SAC Capital Manager Mathew Martoma Turned on Steve Cohen?*, BUSINESS WEEK, Dec. 13, 2012.

4. Attached hereto as Exhibit C is a true and correct copy of a Redacted Memorandum of the Federal Bureau of Investigation's November 8, 2011 Interview of Mathew Martoma, Bates stamped USAO\_0003515.

5. Attached hereto as Exhibit D is a true and correct copy of Peter Lattman & Andrew Ross Sorkin, *A Titan Under A Microscope*, N.Y. TIMES DEALBOOK, May 7, 2011.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on December 6, 2013  
New York, NY

/s/ Richard M. Strassberg  
Richard M. Strassberg (RS5141)

**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2013, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices. I also certify that I have caused copies of the aforementioned document to be served via first class mail, postage prepaid upon all non-CM/ECF participants.

/s/ Richard M. Strassberg  
Richard M. Strassberg (RS5141)